

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

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PEGASUS WIRELESS INNOVATION  
LLC,

*Plaintiff,*

v.

CELLCO PARTNERSHIP d/b/a  
VERIZON WIRELESS *et al.*,

*Defendants,*

ERICSSON INC. and NOKIA OF  
AMERICA CORP.,

*Intervenors,*

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Case No. 2:23-cv-00640-JRG  
(Lead Case)

CELLCO PARTNERSHIP d/b/a  
VERIZON WIRELESS,

*Counterclaim-Plaintiff,*

ERICSSON INC. and NOKIA OF  
AMERICA CORP.,

*Intervenors,*

v.

PEGASUS WIRELESS INNOVATION  
LLC and KT CORPORATION,

*Counterclaim-Defendant and Third-  
Party Defendant.*

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Case No. 2:23-cv-00640-JRG  
(Lead Case)

PEGASUS WIRELESS INNOVATION  
LLC,

*Plaintiff,*

v.

AT&T CORP. *et al.*,

*Defendants,*

ERICSSON INC. and NOKIA OF  
AMERICA CORP.,

*Intervenors,*

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Case No. 2:23-cv-00638-JRG  
(Member Case)

## NEW CINGULAR WIRELESS PCS, LLC,

*Counterclaim-Plaintiff,*

ERICSSON INC. and NOKIA OF  
AMERICA CORP.,

### *Intervenors,*

V.

PEGASUS WIRELESS INNOVATION  
LLC and KT CORPORATION,

### *Counterclaim-Defendant and Third-Party Defendant.*

Case No. 2:23-cv-00638-JRG  
(Member Case)

## PEGASUS WIRELESS INNOVATION LLC,

*Plaintiff,*

V.

T-MOBILE USA, INC. *et al.*,

### *Defendants,*

ERICSSON INC. and NOKIA OF  
AMERICA CORP..

### *Intervenors.*

Case No. 2:23-cv-00639-JRG  
(Member Case)

T-MOBILE USA, INC.,

#### *Counterclaim-Plaintiff,*

ERICSSON INC. and NOKIA OF  
AMERICA CORP.,

### *Intervenors,*

v.

PEGASUS WIRELESS INNOVATION  
LLC and KT CORPORATION

### *Counterclaim-Defendant and Third-Party Defendant.*

Case No. 2:23-cv-00639-JRG  
(Member Case)

**JOINT MOTION TO DISMISS INFRINGEMENT ALLEGATIONS AND NON-INFRINGEMENT AND INVALIDITY COUNTERCLAIMS WITH RESPECT TO  
U.S. PATENTS NOS. 10,594,460; 10,638,463; 10,721,118; AND 11,405,942**

Plaintiff and Counterclaim-Defendant Pegasus Wireless Innovations LLC's ("Pegasus"), Third-Party Defendant KT Corporation ("KT"), and Cellco Partnership d/b/a Verizon Wireless, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., and TracFone Wireless, Inc. ("Verizon"), AT&T Corp., AT&T Services, Inc., AT&T Mobility LLC, AT&T Mobility II LLC, New Cingular Wireless PCS, LLC, and Cricket Wireless LLC ("AT&T"), and T-Mobile USA, Inc., Sprint Solutions LLC, and Sprint Spectrum LLC ("T-Mobile") (Verizon, AT&T, and T-Mobile collectively, "Defendants and Counterclaim-Plaintiffs") and Ericsson Inc. ("Ericsson") and Nokia of America Corp. ("Nokia") (Ericsson and Nokia collectively, "Intervenors") respectfully jointly move to dismiss Pegasus's infringement allegations relating to U.S. Patent No. 10,594,460 (the "'460 Patent"), U.S. Patent 10,638,463 (the "'463 Patent"), U.S. Patent No. 10,721,118 (the "'118 Patent") and U.S. Patent No. 11,405,942 (the "'942 Patent") without prejudice; and dismiss Defendants' and Intervenors' Counterclaims Four, Five, Six, and Eight, and Third Affirmative Defense as they relate to the '460, '463, '118, and '942 Patents without prejudice. The parties respectfully request that the Court grant this joint Motion.

DATED: May 12, 2025

Respectfully submitted,  
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**CERTIFICATE OF SERVICE**

I hereby certify that certify that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via email on May 12, 2025.

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